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October 18, 2024

**VIA CM/ECF**

Hon. Indira Talwani  
United States District Judge  
United States District Court for the District of Massachusetts  
John Joseph Moakley United States Courthouse  
1 Courthouse Way  
Boston, MA 02210

Re: ***Servicios Funerarios GG, S.A. De C.V., v. Advent International Corporation,***  
**Case No.: 23-cv-10684, Proposed Schedule**

Dear Judge Talwani:

We write on behalf of Defendant and Counterclaim-Plaintiff Advent International, L.P. f/k/a Advent International Corporation ("AIC") in advance of this morning's case management conference. As Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. de C.V. ("SF") previewed in its September 24, 2024 letter requesting this conference, the parties have met and conferred in advance of today's proceeding in the interest of narrowing the scheduling issues to be discussed at the conference.

Following that discussion, the parties are aligned that the next phase of this litigation—conducting the depositions of the parties' twenty fact witnesses—should proceed as follows: (i) each party should depose at least five fact witnesses by January 17, 2025, and (ii) fact discovery, including any remaining depositions, should conclude by January 31, 2025.

The parties are also generally aligned on the events to follow the conclusion of fact discovery, and differ principally on the time intervals that should separate those events.

AIC has proposed a schedule that largely tracks the time intervals from prior schedules issued by this Court and Judge Boal. SF has proposed a more compressed schedule. We look forward to discussing these matters with the Court.

For the Court's convenience, AIC's proposed schedule—pursuant to which this case would be ready for trial (pending resolution of summary judgment and *Daubert* motions) by July 3, 2025—is attached as Appendix A.

Respectfully,



Andrew J. Rossman

CC: Counsel of record (via CM/ECF)

**Appendix A – AIC’s Proposed Schedule**

<b>Event</b>	<b>Date</b>	<b>Interval</b>
Parties complete at least five fact depositions per side (10 total).	1/17/25	
Close of fact discovery.	1/31/25	
Plaintiff and Counterclaim-Plaintiff serve trial expert reports.	2/14/25	14 days after close of fact discovery
Defendant and Counterclaim-Defendant identify rebuttal experts.	2/28/25	14 days after opening expert reports served
Defendant and Counterclaim-Defendant serve rebuttal expert reports.	3/21/25	21 days after rebuttal experts identified
Parties complete expert depositions.	4/25/25	35 days after rebuttal expert reports served
Parties file any dispositive and <i>Daubert</i> motions.	5/9/25	14 days after expert depositions complete
Parties file oppositions to dispositive and <i>Daubert</i> motions.	6/13/25	35 days after motions filed
Parties file replies to dispositive motions.	7/3/25	19 days after oppositions filed

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2024, I served a copy of the foregoing document via ECF to all counsel of record.

/s/ Andrew J. Rossman

Andrew J. Rossman  
*Counsel for Defendant and  
Counterclaim-Plaintiff AIC*